

EXHIBIT B

From: fingerk@gtlaw.com
Sent: Monday, April 23, 2018 1:51 PM
To: Halstead, Ellen; davisjo@GTLAW.com
Cc: ghorowitz@kramerlevin.com; AByowitz@KRAMERLEVIN.com; MitchellN@gtlaw.com; clearyd@gtlaw.com
Subject: RE: PREPA - Production of Fiscal Plan materials

Ellen – My understanding is that item #1 on your list was produced by the Oversight Board. As for items # 2 – 7, PREPA will not produce those documents outside the data room. In addition, PREPA does not intend to produce future “Fiscal Plan Development Materials” outside of the data room, but will endeavor to provide a privilege log of materials withheld from production.

Kevin Finger
Shareholder
Greenberg Traurig, LLP | 77 West Wacker Drive | Suite 3100 | Chicago, IL 60601
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From: Halstead, Ellen [mailto:Ellen.Halstead@cwt.com]
Sent: Friday, April 20, 2018 11:11 AM
To: Finger, Kevin (Shld-CHI-LT); Davis, Joseph P. (Shld-Bos-LT)
Cc: ghorowitz@kramerlevin.com; AByowitz@KRAMERLEVIN.com; Mitchell, Nancy A (Shld-NY-CP-Bky); Cleary, David (Shld-Phx-Bky)
Subject: RE: PREPA - Production of Fiscal Plan materials
Importance: High

Kevin,
Just following up regarding production of the seven documents identified below, any future “Fiscal Plan Development Materials” and whether a supplemental privilege log will be provided.

Given that the hearing is scheduled for May 21st, we want to get the joinder on file by Monday, April 23rd. Given this timing, can you please let us know by noon eastern on April 23 whether PREPA will agree to produce the identified documents, any future “Fiscal Plan Development Materials” and a supplemental privilege log.

Happy to discuss further if easier,

Ellen M. Halstead
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Tel: (212) 504-6732 | Cell: (917) 526-2478 | Fax: (212) 504-6666
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From: fingerk@gtlaw.com [mailto:fingerk@gtlaw.com]
Sent: Wednesday, April 18, 2018 1:21 PM
To: Halstead, Ellen <Ellen.Halstead@cwt.com>; davisjo@GTLAW.com
Cc: ghorowitz@kramerlevin.com; AByowitz@KRAMERLEVIN.com; MitchellN@gtlaw.com; clearyd@gtlaw.com
Subject: RE: PREPA - Production of Fiscal Plan materials

I just received those logs today and will review them.

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From: Halstead, Ellen [<mailto:Ellen.Halstead@cwt.com>]
Sent: Wednesday, April 18, 2018 9:36 AM
To: Finger, Kevin (Shld-CHI-LT); Davis, Joseph P. (Shld-Bos-LT)
Cc: ghorowitz@kramerlevin.com; AByowitz@KRAMERLEVIN.com; Mitchell, Nancy A (Shld-NY-CP-Bky); Cleary, David (Shld-Phx-Bky)
Subject: RE: PREPA - Production of Fiscal Plan materials

Kevin,
That schedule works for our side.

Jody was also going to check with Proskauer and O'Melveny regarding whether the privilege logs that they produced on April 6, 2018 included responsive documents regarding PREPA. If the logs did not include some or all of such documents being withheld based on a claim of privilege, can you confirm that a supplemental log will be produced?

Thanks,

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From: fingerk@gtlaw.com [<mailto:fingerk@gtlaw.com>]
Sent: Tuesday, April 17, 2018 6:26 PM
To: Halstead, Ellen <Ellen.Halstead@cwt.com>; davisjo@GTLAW.com
Cc: ghorowitz@kramerlevin.com; AByowitz@KRAMERLEVIN.com; MitchellN@gtlaw.com; clearyd@gtlaw.com
Subject: RE: PREPA - Production of Fiscal Plan materials

Ellen – we are conferring with our client regarding your request. In the event we don't come to an agreement, we propose that PREPA file its opposition 14 days after the filing of the joinder, and the joining parties file their reply 7 days after that. Please let us know if that is agreeable to you.

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From: Halstead, Ellen [<mailto:Ellen.Halstead@cwt.com>]
Sent: Tuesday, April 17, 2018 4:42 PM
To: Davis, Joseph P. (Shld-Bos-LT)
Cc: Finger, Kevin (Shld-CHI-LT); ghorowitz@kramerlevin.com; Byowitz, Alice J.
Subject: RE: PREPA - Production of Fiscal Plan materials

Jody,

Additionally, below are the documents in the data room that would be the subject of the joinder. In the joinder, the PREPA bondholders/insurers would request that the Court grant the relief requested in the attached Motion to Compel as to PREPA and compel PREPA to produce the below documents outside of the data room subject to the protective order previously entered (Case No. 17-04780-LTS, ECF No. 708) as well as any future "Fiscal Plan Development Materials" (which is defined in the Motion to Compel). We reserve the right to identify additional documents.

Can you please confirm that PREPA will not agree to produce the below documents and any future Fiscal Plan Development Materials outside of the dataroom?

1. 1.2.6
2. 2.8.3.1
3. 2.8.4.1
4. 2.8.4.2
5. 4.10.3.3.529
6. 4.10.3.3.546
7. 4.11.2.3

We are available to discuss further if necessary.

Ellen M. Halstead

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From: Halstead, Ellen

Sent: Tuesday, April 17, 2018 3:17 PM

To: 'davisjo@GTLAW.com' <davisjo@GTLAW.com>

Cc: fingerk@gtlaw.com; ghorowitz@kramerlevin.com; Byowitz, Alice J. <AByowitz@KRAMERLEVIN.com>

Subject: RE: PREPA - Production of Fiscal Plan materials

Jody,

Just following up on this email. We would like to file the joinder but want to propose a briefing schedule.

I believe you are out this week so I am adding Kevin Finger to this chain.

Ellen M. Halstead

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From: Halstead, Ellen

Sent: Friday, April 13, 2018 3:28 PM

To: davisjo@GTLAW.com

Subject: PREPA - Production of Fiscal Plan materials

Hi Jody,

I tried calling you earlier but didn't leave a message. Greg asked that I follow-up on our call earlier in the week, especially to discuss a briefing schedule. Judge Dein entered the attached scheduling order on the motion to compel and set the hearing for May 21 at 1:30 pm in Boston.

We are planning on filing the joinder early next week. We would propose that PREPA file its opposition on April 30 and the reply to the PREPA opposition be filed on May 7.

I am not in the office right now, but you can call my cell or let me know what time works for you and I will call you.

Ellen M. Halstead

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